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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO SUBMIT JOINT OR
COMPETING DEPOSITION AND EXPERT
DISCOVERY PROTOCOLS**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

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STIPULATION

WHEREAS, on December 28, 2023, the Court established a schedule regarding discovery and initial motions. Pretrial Order No. 5, Dkt. No. 175;

WHEREAS, the Court ordered Plaintiffs' Liaison Counsel to meet and confer with Uber regarding, among other things, a pre-trial order regarding the timing of deposition discovery, a protocol for depositions, and expert discovery (the "Deposition and Expert Discovery Protocols") that will be followed in this case. Pretrial Order No. 5, Dkt. No. 175 at 4-5. The Court further ordered the parties to submit joint or competing Protocols by February 23, 2024. *Id.*; and

WHEREAS, the parties have exchanged draft Deposition and Expert Discovery Protocols, and met and conferred to discuss the issues in dispute, and agree that extending the deadline to submit a joint or competing Protocols to February 27, 2024, will facilitate the efficient resolution of those disputes and conserve judicial resources;

THEREFORE, the parties respectfully request the Court enter the parties' stipulation that:

By February 27, 2024, the parties shall submit a joint or competing Deposition and Expert Discovery Protocols. If the parties submit competing Deposition and Expert Discovery Protocols, each shall submit its own proposed order regarding the timing of deposition discovery, a protocol for depositions, and expert discovery with a memorandum (not to exceed 10 pages) explaining why the Court should adopt that party's proposal.

IT IS SO STIPULATED.

1 Dated: February 23, 2024

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9 Dated: February 23, 2024

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FILER'S ATTESTATION

I, Randall S. Luskey, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: February 23, 2024

By: /s/ Randall S. Luskey
Randall S. Luskey

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION

Case No. 3:23-md-03084-CRB

**[PROPOSED] ORDER GRANTING
 STIPULATION EXTENDING TIME TO
 SUBMIT JOINT OR COMPETING
 DEPOSITION AND EXPERT DISCOVERY
 PROTOCOLS**

This Document Relates to:
 ALL ACTIONS

The Court hereby GRANTS the parties' stipulation as follows:

By February 27, 2024, the parties shall submit a joint or competing Deposition and Expert Discovery Protocols. If the parties submit competing protocols regarding the timing of deposition discovery, a protocol for depositions, and expert discovery, each shall submit its own proposed order regarding the timing of deposition discovery, a protocol for depositions, and expert discovery (not to exceed 10 pages) explaining why the Court should adopt that party's proposal.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: _____, 2024

 HON. LISA J. CISNEROS
 UNITED STATES MAGISTRATE JUDGE